

May 17, 2016

Charles County Board of Commissioners
c/o Mr. Steven Ball, AICP, LEED AP
Planning Director
Department of Planning and Growth Management
Charles County Government
200 Baltimore Street
La Plata, Maryland 20646

Re: Comprehensive Plan Comments – May 17, 2016 Public Hearing

Dear Mr. Ball:

On behalf of the Maryland Building Industry Association (“MBIA”) I am pleased to submit comments on the latest draft of the Comprehensive Plan update for the above referenced public hearing record. Our comments are formatted in order addressing key elements of the plan.

Chapter 2 Background

Population, Housing and Employment

The population, housing and employment projections should be updated to reflect the effect of the adopted Tier Map and proposed Watershed Conservation District zoning on future growth patterns. The results may dictate changes to other sections of the Plan.

Chapter 3 Land Use

General

The Plan should recognize that consumer preference is the primary market force driving residential development. People choose where they live for a variety of reasons. New residents are attracted to Charles County because they can afford their piece of the American Dream, a single family home in a safe community with good schools. Current residents seeking to move up or downsize have similar desires. The Plan must support a diverse housing stock that satisfies consumer demand.

Changes from the 2006 Land Use Plan

11. The Deferred Development District was established to ensure orderly growth outward from the urban core. The current one unit to ten acre zoning has successfully prevented leapfrog development in this area

while preserving land for future growth. This area now has a Tier Map designation of Tier IV and proposed Watershed Conservation District zoning designation which further restricts development. There has been significant public investment in infrastructure to accommodate future growth in this area that should not be wasted. The Deferred Development District designation should be retained to reserve development capacity beyond the current planning horizon.

One of the rationals given for replacing the Deferred Development District with a Water Conservation District is limiting impervious cover to protect the Mattawoman creek. Recent studies have demonstrated with the implementation of environmental site design stormwater management there is no longer a linear relationship between the health of a stream and impervious cover. A more detailed discussion on this matter is provided with our comments on Chapter 4, Section 4.6 of the Plan.

Development Districts

The Plan should recognize that the infrastructure required to support growth is not limited to schools, roads, water and sewer. County government must take a more proactive role to ensure adequate parking, stormwater management, and recreation facilities are provided to support planned growth.

Development District Residential District

We agree clustering should be encouraged within the Development District. However, current regulations discourage the use of cluster design. The Plan should require a review of current ordinances, policies and procedures to identify and remove barriers to compact development.

Redevelopment District

The Land Use Plan depicts a “Transit Corridor” from Waldorf to White Plains. The width of the proposed corridor should be expanded to 1 mile from the proposed transit line in order to provide sufficient land to accommodate the population density required to support future light rail.

Actions

3. Current policies have effectively managed the rate and location of growth in the County. A growth rate management model isn’t necessary.

Evaluating potential incentives to encourage development in targeted areas should be included as an Action item under this chapter. This should include an evaluation of current barriers to development in targeted areas.

Chapter 4 Water Resources

4.1 Background - Other Assumptions

The average water consumption and wastewater generation rates for residential dwellings seem high given the current prevalence of water conserving fixtures and shrinking household size. These rates should be validated based on current conditions.

4.6 Evaluation of Water Quality Impacts - Impervious Surfaces

The belief that impervious surfaces have an inevitable negative impact on the health of a stream is no longer valid. Recent studies by the Environmental Protection Agency, The Center for Watershed Protection and others demonstrate there is no longer a direct linear relationship between impervious coverage and stream health. This is primarily due to the fact that current stormwater management regulations ensure post development hydrologic conditions are equivalent to the hydrologic condition of woods both in water quality and runoff volume. Impervious cover is now more properly defined as *effective impervious cover* for watershed planning. For example, assuming all other conditions are equal, one acre of impervious surface constructed under the stormwater regulations applicable in 2000 will have a significantly greater impact on the receiving waterway than one acre of impervious surface constructed under the current stormwater regulations. In addition, impervious caps ignore the significant pollutant removal provided by stream buffers. Impervious cover caps are outdated planning tools. The best available science should be used to guide watershed planning.

Chapter 5 Natural Resource Protection

Mattawoman Creek Watershed

The 2003 US Army Corps of Engineers Watershed Management Plan is outdated due to advances in stormwater management technology. The watershed management plan should be updated using the best science available.

Stream buffer widths should be established based on sound science. Recent studies have demonstrated the critical buffer width varies based on the particular pollutant; 40 to 50 feet for total suspended solids (sediment); 50 to 60 feet for phosphorus and 55 to 65 feet for nitrogen and more soluble pollutants. At relatively small buffer widths the pollutant removal efficiency increases rapidly as buffer width increases. However, minimal additional pollutant removal is achieved as the buffer width increases beyond the critical width.

The DNR “stream valley delineation” is flawed. It cannot be replicated or verified at the project level and should not be used to establish protection areas. The delineation was not field verified as recommended in

the USACOE study. Protection areas must be defined based on sound science using criteria that can be replicated and verified at the project level.

Chapter 6 Energy Conservation

General

The Plan should acknowledge there are a variety of nationally recognized programs that promote conservation and efficiency. Incentives should be provided to encourage Green Building and Development projects.

Green Codes and Standards Review

Projects designed to the NAHB Green Building Standards and other accredited Green Building programs should be eligible for the same benefits as LEED projects.

Chapter 7 Economic Development

This section of the Plan should be updated to incorporate the Strategic Economic Development Plan recently prepared for the Economic Development Department.

In addition, a discussion on the positive fiscal impact of residential construction should be included in this section. It has been stated that residential development doesn't pay for itself. In other words, the cost of providing services for residents exceeds the revenue the government captures from those residents. This is a common misconception which has been proven false. Please refer to the attached report that analyzes the fiscal break-even point for home values in Charles County.

Chapter 8 Transportation

Actions

The Plan actions should include development of a viable alternative to the Cross County Connector and a limited western bypass of Route 301 from north of Brandywine to Route 228. A multimodal system to move goods, services and people efficiently within the County as well as regionally is critical for economic prosperity.

Chapter 9 Community Facilities and Services

General

Major infrastructure needed to support planned high density residential, mixed use and commercial development should be prioritized and potential funding mechanisms identified. The Plan should

acknowledge that public investment will be required to facilitate the high density mixed use and commercial development envisioned for Waldorf.

Education

The CCPS CIP must ensure adequate school capacity is available to support planned growth.

Policies and Actions – Policies - Education

9-5 The school construction program must be aligned with the County's growth plans to ensure adequate capacity is available to serve planned growth areas. In addition, redistricting should be used to efficiently utilize available capacity.

Actions

The Plan should include an action for improved communication and coordination between County Government and the Board of Education to ensure adequate school facilities are provided to match planned growth.

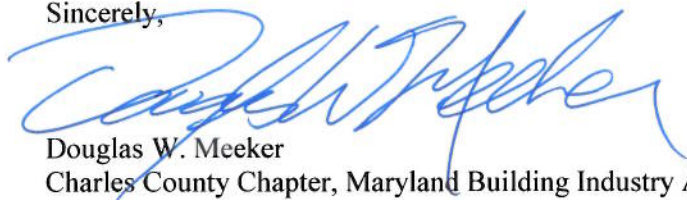
Chapter 10 Community Development

Housing Affordability

The Plan should include an Action Item to review the impact of governmental regulations on housing affordability.

We appreciate the opportunity to provide input on this important document. With minor adjustments this Plan will provide a framework for sustainable, balanced growth that meets the long term needs of Charles County.

Sincerely,



Douglas W. Meeker
Charles County Chapter, Maryland Building Industry Association

Attachment

cc: Marcus Jackson - MBIA

MEMO

Date:	February 1, 2016	Telephone:	Fax:
To:	Doug Meeker <i>Elm Street Development</i>	410.266.9700	703.734.0322
From:	Dean D. Bellas, Ph.D.	703.780.8200	703.780.8201
UAI #:	P-151009-ESD		
Pages:	11 (including this page)		
Re:	Fiscal Break-Even Values versus New Construction Sales Prices Charles County, Maryland (FY2005 – FY2014)		

Dear Mr. Meeker:

As per your request, attached please find the fiscal break-even values for existing and new residential units in Charles County, Maryland for the period FY2005 through FY2014.

These fiscal break-even values have also been compared to the average new home (new construction) sales prices by year in the County from 2005 to 2014.

If you should have any questions regarding this memo, please do not hesitate to call or write. Until then, I remain,

Most sincerely,

Dr. Dean D. Bellas, Ph.D.



Urban Analytics, Inc.

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Fiscal Impact Break-Even Values: New and Existing Residential Units Charles County, Maryland FY2005 – FY2014

A comparative analysis of the estimated fiscal break-even values for residential units (both new and existing) in Charles County, Maryland is shown in Table 1. The ten-year trend in the movement of break-even values in the County is graphically shown in Figure 1. The estimated fiscal break-even point in Charles County in fiscal year 2005 was \$181,800 for single-family houses, \$179,200 for townhouses, and \$123,000 for multifamily for-sale and for-rent units. Nine years later, the estimated fiscal break-even point in Charles County in fiscal year 2014 was \$271,600 for single-family houses, \$284,100 for townhouses, and \$241,900 for multifamily for-sale and for-rent units. The estimated fiscal break-even values shown in Table 1 reflect estimated market values and are reported in current dollars.

The “break-even point” is the value at which all operating costs and debt service associated with a specific housing unit type will be compensated for by the operating revenues generated by that housing unit type and the spending of its occupants (households). In other words, the fiscal break-even value is the point where a specific housing unit type “pays-its-own-way.” Housing units sold at the break-even value or higher will pay for all of their capital and operating costs, assuming a continuation in the levels-of-service, revenue structure, and tax rates currently provided for in the audited financial statements for the appropriate fiscal year.

These break-even values provide a guideline for assessing the fiscal impact of individual projects. Break-even values fluctuate from fiscal year to fiscal year based on a number of variables. These variables include (*but are not limited to*): estimated non-real estate operating revenues generated; estimated outlays for public services (public expenditures); the average household size by unit type; the average student generation factor by unit type; changes in the annual level of public school enrollment; estimated real estate assessed values by unit type; real estate tax rates; non-real estate taxes; and fees (charges for services) generated by service category. As the variables change each fiscal year, the effect on fiscal break-even values is non-linear. This non-linear effect is demonstrated in Table 1 for fiscal years 2005 through 2014. In the back of this memo is a detailed discussion of the fiscal impact methodology and the mathematical model used to estimate these fiscal break-even values.

It is important to note here that fiscal break-even values should *not* be used by the County to restrict the development of new housing units that are priced below the break-even fiscal value. The result of such a land-use policy of exclusion based solely on value would be to make Charles County’s housing unaffordable to households working in the public service sector and in other jobs not having high, value-added salaries.

Table 1
Fiscal Break-Even Values¹
New and Existing Residential Units
Charles County, Maryland
Fiscal Years 2005-2014

Charles County	Fiscal Break-Even Single Family ²	Fiscal Break-Even Town House	Fiscal Break-Even Multifamily ³
<i>Existing Units in Charles County</i>			
FY 2005	\$ 181,800	\$ 179,200	\$ 123,000
FY 2006	\$ 255,300	\$ 250,400	\$ 183,200
FY 2007	\$ 220,700	\$ 212,700	\$ 137,400
FY 2008	\$ 260,900	\$ 251,200	\$ 178,400
FY 2009	\$ 291,700	\$ 287,900	\$ 212,200
FY 2010	\$ 329,500	\$ 323,250	\$ 224,100
FY 2011	\$ 298,450	\$ 293,100	\$ 267,400
FY 2012	\$ 280,850	\$ 275,950	\$ 251,450
FY 2013	\$ 278,900	\$ 280,150	\$ 242,800
FY 2014	\$ 271,600	\$ 284,100	\$ 241,900

Source: Urban Analytics, Inc. *Note:* ¹The estimated fiscal break-even value reflects estimated market value, in current dollars. ²Includes duplex-style units. ³Includes for-sale and for-rent unit types.

The non-linear trend in the fiscal break-even values from FY2005 to FY2014 shown in Table 1 can be explained by a number of reasons including technical adjustments to the model based on discussions with Charles County staff, increases or decreases in annual operating revenues generated and operating expenditures incurred, annual increases or decreases in public school enrollment figures, changes in the average student generation factor each year by type of unit, changes in the County's real estate tax rate, and changes in the County's annual population and employment base.

To illustrate how the non-linear trend in fiscal impact values is affected by annual socio-economic changes in Charles County and to appreciate the sensitivity of the fiscal impact model to multivariate inputs, two independent variables are presented in Table 2 as examples. These variables are: annual student enrollment in Charles County public schools, and the County's annual real estate tax rate (general county tax rate including education). The County's real estate tax rate remained constant at \$0.962 per \$100 of assessed value from FY2005 through FY2011. Beginning in FY2012, the County's tax rate increased by 4.21 percent from FY2011 to FY2012, 5.01 percent from FY2012 to FY2013, and 8.39 percent from FY2013 to FY2014. Holding all other variables constant, an increase in the annual real estate tax rate equates to a *lower* real estate break-even value.

Table 2
Historical Data on Selected Independent Variables
Charles County, Maryland
Fiscal Years 2005-2014

Fiscal Year	Real Estate Tax Rate ¹	% Change Year/Year	Public School Enrollment	% Change Year/Year
FY 2005	\$ 0.9620		24,981	
FY 2006	\$ 0.9620	0.00%	25,339	1.43%
FY 2007	\$ 0.9620	0.00%	25,797	1.81%
FY 2008	\$ 0.9620	0.00%	25,843	0.18%
FY 2009	\$ 0.9620	0.00%	25,861	0.07%
FY 2010	\$ 0.9620	0.00%	25,897	0.14%
FY 2011	\$ 0.9620	0.00%	25,955	0.22%
FY 2012	\$ 1.0025	4.21%	25,870	-0.33%
FY 2013	\$ 1.0527	5.01%	25,717	-0.59%
FY 2014	\$ 1.1410	8.39%	25,524	-0.75%

Source: Charles County Treasurer's Office; Charles County Board of Education, Student Services; Urban Analytics, Inc. *Note:* ¹General County (including Education).

On the other hand, student enrollment in Charles County peaked in school year 2011 at 25,955 and has declined in SY2012, SY2013 and SY2014. During this time annual operating expenditures for public education in Charles County has been increasing. Holding all other variables constant, a decrease in annual student enrollment equates to a *higher* real estate break-even value.

It is interesting to note that the fiscal break-even point for town houses in Charles County has been increasing since FY2012. Generally speaking, as housing size and the number of bedrooms per housing unit increases, so too does the number of public school-age children per housing unit type. In Table 3, the average student generation factors by housing unit type in Charles County from FY2011 through FY2014 are presented.

Table 3
Historical Data on Student Generation Factors
Charles County, Maryland
Fiscal Years 2011 - 2014

Housing Unit Type	FY 2011	FY 2012	FY 2013	FY 2014
Single Family	0.49	0.49	0.48	0.46
Town House	0.48	0.48	0.48	0.48
Multifamily	0.44	0.44	0.42	0.41

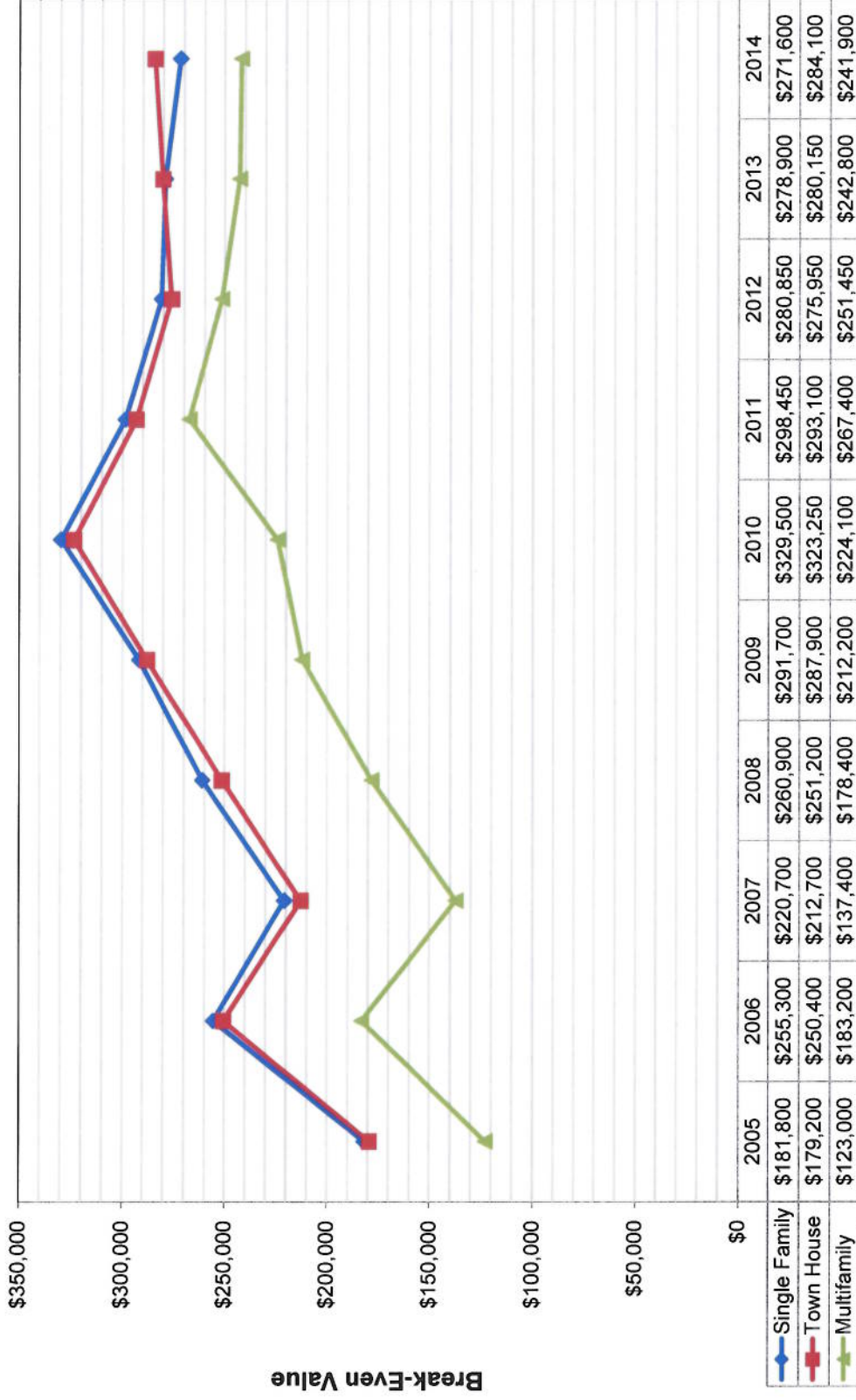
Source: Charles County Department of Planning and Growth Management; Urban Analytics, Inc.

The average student generation factor for single-family and multifamily units has been slowly declining over the past four years while remaining constant at 0.48 (or 48 children per 100 units) for town houses. There are two possible explanations for this trend. The first is that the average square foot size and the number of bedrooms in new town houses in Charles County has been increasing. The second is that the average closing value of new single-family houses in Charles County has increased by \$49,894 from \$362,796 in 2010 to \$412,690 in 2014 (see Table 4). During this same four-year period, the average closing value of new town houses in the County has increased by only \$25,969 from \$258,558 in 2010 to \$284,527 in 2014. This might suggest that housing values and the required household incomes associated with new home purchases might play an equally important (*if not greater*) role than the number of bedrooms in *estimating the number* of children per single-family and town house housing units.

In Table 4, a comparison of the average new home (new construction) sales price to the fiscal break-even value in Charles County each year from 2005 through 2014 is presented. Over the ten-year period from 2005 to 2014, the average sales price of new, single-family housing units has exceeded the fiscal break-even point for single-family houses in each given year. During this same ten-year period, the average sales price of new, town house units has exceeded the fiscal break-even point for town house units each year from 2005 through 2008. As a result of the 2007-2009 national recession, the value of new town house units in the County decreased at a greater rate than that for single-family units. However, the differential between the value of new town house units and the fiscal break-even value of town house units has declined from 2010 to 2013. In fiscal year 2014, the average closing value of new town houses units in Charles County was slightly greater than the fiscal break-even point.

There are insufficient data on new multifamily units in Charles County to compare to the fiscal break-even value of all (both new and existing) multifamily units in the County.

Figure 1
Fiscal Break-Even Values: New and Existing Residential Units
Charles County, Maryland (FY2005 - FY2014)



Fiscal Year (ending June 30th)

Table 4
Comparison of New Construction Sales Prices to Fiscal Break-even Values
Charles County, Maryland
2005 to 2014

Total Units Closed by Year		Single-Family Detached Units					Townhouse Units				
		Units Closed	Distribution*	Average Closing Value	Fiscal Break Even Value**	Difference: Surplus (Shortfall)	Units Closed	Distribution*	Average Closing Value	Fiscal Break Even Value**	Difference: Surplus (Shortfall)
2014	692	429	61.99%	\$ 412,690	\$ 271,600	\$ 141,090	263	38.01%	\$ 284,527	\$ 284,100	\$ 427
2013	653	457	69.98%	\$ 390,983	\$ 278,900	\$ 112,083	196	30.02%	\$ 279,853	\$ 280,150	\$ (297)
2012	580	444	76.55%	\$ 369,464	\$ 280,850	\$ 88,614	136	23.45%	\$ 261,217	\$ 275,950	\$ (14,733)
2011	516	430	83.33%	\$ 354,308	\$ 298,450	\$ 55,858	86	16.67%	\$ 255,094	\$ 293,100	\$ (38,006)
2010	567	457	80.60%	\$ 362,254	\$ 329,500	\$ 32,754	110	19.40%	\$ 255,849	\$ 323,250	\$ (67,401)
2009	444	306	68.92%	\$ 386,051	\$ 291,700	\$ 94,351	138	31.08%	\$ 256,462	\$ 287,900	\$ (31,438)
2008	407	370	90.91%	\$ 444,214	\$ 260,900	\$ 183,314	37	9.09%	\$ 329,705	\$ 251,200	\$ 78,505
2007	762	597	78.35%	\$ 513,891	\$ 220,700	\$ 293,191	165	21.65%	\$ 320,553	\$ 212,700	\$ 107,853
2006	737	670	90.91%	\$ 544,212	\$ 255,300	\$ 288,912	67	9.09%	\$ 371,484	\$ 250,400	\$ 121,084
2005	704	679	96.45%	\$ 460,865	\$ 181,800	\$ 279,065	25	3.55%	\$ 296,672	\$ 179,200	\$ 117,472

Source: Metrostudy, a Hanley-Wood company***; Elm Street Development.; Urban Analytics, Inc.

Note:

* The distribution of total units closed by unit type ranges from 61.99% to 96.45% for single-family units and 3.55% to 38.01% for townhouse units.

** Fiscal break-even values do not include additional, one-time payments for school excise tax or DRRRA payments.

*** Metrostudy report for each year generated on 10/23/2015.

Fiscal Impact Methodology

In the field of urban planning and real estate development, a fiscal impact model estimates revenue and expenditure flows at the local government level generated by various residential and non-residential land-uses. Since the 1930s, there has been an incorrect conclusion drawn by the findings of fiscal impact models that new residential land uses generate a net fiscal deficit (or burden) on the budgets of local jurisdictions while all new non-residential land uses generate a net fiscal surplus (or benefit). This incorrect conclusion has historically been supported by two overarching errors in fiscal impact modeling: (1) weaknesses in the mathematical construction of these models; and (2) weaknesses in the underlying assumptions used to construct these models.

Fiscal Impact Model

In order to accurately identify and quantify the distinct fiscal flows within counties, cities and towns, a fiscal impact model was developed by Dr. Bellas that allocates local revenues and expenditures by land use category including distributions across different types of residential and non-residential land uses. Distributing these revenue and expenditure flows involves a two-step process: first, allocating revenues and expenditures between residential and non-residential land uses; and second, developing coefficients to distribute these revenue and expenditures by land-use sub-sector by their direct sources or beneficiaries. In every jurisdiction, the underlying basis for analyzing revenues and expenditures is the local government's third-party audited financial statements (not their proposed or adopted budgets).

In this memo, the basis for the fiscal impact analysis of the fiscal break-even values was the Charles County Comprehensive Annual Financial Report (CAFR) for each fiscal year from 2005 to 2014. The audited revenues and expenditures reported in each CAFR by source and department were allocated between those public operating revenues generated and those public service operating expenditures demanded by residential and non-residential uses according to a detailed examination of actual collected revenues and spending patterns in each fiscal year from 2005 through 2014. The allocation of fiscal revenues and expenditures were calibrated by the fiscal impact model to the demographic and economic characteristics of the County each year. The residential share of each category of operating revenues (i.e., the share of revenues generated by local residents as opposed to local businesses) and operating expenditures (i.e., the share of the provision of expenditures for public services to local residents as opposed to local businesses) was converted to a per capita equivalent to facilitate the calculation of fiscal flows associated with each residential land use analyzed. The non-residential share of each category of operating revenues and expenditures was converted to a per job equivalent to facilitate the calculation of non-residential fiscal flows from office, retail, industrial, and other non-residential development.

The mathematical approach used in the fiscal impact model assumes that each person living or working in Charles County has access to the County's services and therefore potentially shares from the benefits of these services. This expenditure allocation is not based on the actual utilization of public services by specific individuals but rather reflects equal access to and availability of these services to all residents and persons working in Charles County. The findings derived in this memo are based on an analysis of average costs, not marginal costs. By using average costs and revenue multipliers in this analysis and not adjusting revenue sources and expenditure demands to reflect the income structure of existing and future residents in the County or the actual utilization rate of specific

services, the actual revenue forecast by housing unit type is likely to be understated and the actual demand for public services and programs is likely to be overstated. The net result of this approach is that the estimated break-even values shown in Table 1 may be higher than actual break-even values in the County.

In an analysis of average revenues and expenditures, it is common for the reader to wonder why the marginal costing approach to estimating revenues and expenditures is not utilized. The answer is two-fold. First, there is a data collection problem with the marginal costing approach. While the revenue and expenditure multipliers have been localized in the fiscal model to reflect the socio-economic characteristics of Charles County, it is important to note that not all local data needed to minimize the margin of error in the simulation estimates (in the marginal costing approach) are available from the County or through published third-party data sources. The lack of local data requires the analyst to use either regional or national data. This leads to the second problem with the marginal costing approach; a tendency for the analyst to incorrectly develop assumptions based on a limited data set, generally resulting in a larger error in the estimate of the multipliers. Thus, the marginal approach to estimating revenues and expenditures is often based on assumptions that tend to overstate the revenue estimates and understate the expenditure estimates. In the fiscal impact simulation model, however, where specific revenues and expenditures could be identified and assigned based on either actual use, income or values, the estimates were calculated based on those specific data.

Limiting Conditions

The fiscal impact model developed by Dr. Bellas and used by Urban Analytics, Inc., is a simulation model, not a predictive model. The model simulates the financial conditions of counties, cities and towns across the United States based on third-party, audited financial statements prepared for a given point in time and always in the past. The basis for the analysis and the findings presented in this memo is the Charles County Comprehensive Annual Financial Report (CAFR) for fiscal years 2005 to 2014. The methodology employed in the fiscal impact model is land-use and price-point sensitive, and these variables are subject to change as market conditions change. The model is also sensitive to persons per unit, school-age children per unit, and the number of square feet per worker. These variables are often based on third-party generated sample data when the absence of actual data exist. Additionally, the model is subject to project-specific socioeconomic conditions at a given point in time. The estimated fiscal break-even values each year assume that fiscal year levels-of-service provided by Charles County and the fiscal year tax base and tax rates in the fiscal year analyzed remain constant. If tax rates or levels of services are changed in future years, then respective revenue and expenditure estimates would also change. Similarly, if assessments change at a rate exceeding the rate of inflation, then the value of the taxable base for calculating revenues would also change.

All work undertaken in this memo was conducted by Urban Analytics, Inc., in an objective and independent fashion. The results (findings) of the analyses conducted are based solely on the circumstances as Urban Analytics, Inc., sees them, as derived from research and analyses conducted by Urban Analytics, Inc., or third parties. The findings presented in this memo were not contingent upon any predetermined or favorable results (findings) by Urban Analytics, Inc., or its client. When third-party data were utilized in the analysis and preparation of this memo, Urban Analytics, Inc., relied upon such data in the formulation of all analyses and did not independently verify the accuracy of such third-party data. All information contained in the report which was furnished by others was

assumed to be true, correct and reliable. Urban Analytics, Inc., assumes no responsibility for the accuracy of information provided by others. The estimation of the fiscal break-even values each year was based on historical audited financial data as reflected in the County's Comprehensive Annual Financial Report (CAFR) for the fiscal years analyzed and other non-audited data from third parties as of the fiscal year analyzed. Due to the principles of simulation, change and anticipation, the fiscal break-even value estimates are only valid for the fiscal year analyzed. The opinions and findings contained in this memo are those of Urban Analytics, Inc., and no responsibility is accepted by Urban Analytics, Inc., and its employees for the results of actions taken by others based on the information contained therein.

Data Limitations

The findings in this memo are subject to the quality of the data provided by Charles County and other third-party sources. When analyzing the data provided by any jurisdiction, the possibility exists that conflicting and contradictory data might appear in various documents. When such third-party data were utilized in the analysis and preparation of this memo, Urban Analytics, Inc., relied upon such data in the formulation of all analyses and did not independently verify the accuracy of such third-party data. All information contained in this memo which was furnished by others was assumed to be true, correct and reliable. Urban Analytics, Inc., assumes no responsibility for the accuracy of information provided by others.

About the Author

Dean D. Bellas, Ph.D., is president of Urban Analytics, Inc., an Alexandria, Virginia-based real estate and urban planning consulting firm providing urban development analytical services to public, private, and institutional-sector clients. Consulting services include fiscal and economic impact studies, market research and economic base analyses, real estate asset management, real estate development economics, and project feasibility studies. Since 1996, Dr. Bellas has provided consulting services in Arizona, California, Illinois, Indiana, Kansas, Maryland, Michigan, Minnesota, Virginia, West Virginia, Wisconsin, and the District of Columbia. Dr. Bellas has analyzed the fiscal impact on over 18,000 residential units and over 38.7 million square feet of non-residential space. The total estimated value of all land-uses analyzed is over \$5.5 billion. In addition, Dr. Bellas has authored or co-authored over sixty research reports on the fiscal and economic impact of real estate development. Dr. Bellas has been a consultant to the Department of the Treasury and to the State Department.

In addition to Urban Analytics, Dr. Bellas is also an adjunct faculty member in the Real Estate Development concentration within the School of Architecture and Planning at the Catholic University of America where he teaches Real Estate Finance, Real Estate Investment, Urban Economics, and Asset Management and Strategic Planning. Previously, he has been an adjunct faculty member in the School of Professional Studies in Business and Education at the Johns Hopkins University, and an adjunct faculty member in the School of Management at George Mason University. Dr. Bellas has also taught candidates for the CFA designation on behalf of the Washington Society of Investment Analysts.

Dr. Bellas received a Bachelor of Science in Business Administration from Western New England University with a concentration in Finance (1982), a Master of Urban and Regional Planning from the George Washington University (1993), and his Doctorate in Public Policy with a concentration in

regional economic development policy at George Mason University (2005). His doctoral dissertation was entitled, "*Fiscal Impact Simulation Modeling: Calculating the Fiscal Impact of Development.*" His research interests include regional and local developmental growth patterns, economic and fiscal impact effects of real estate development on municipal government, and economic development policy. Dr. Bellas is a member of the National Economists Club, and of Lambda Alpha International, an honorary society for the advancement of land economics. He is a full member of the Urban Land Institute. Dr. Bellas sits on ULI's national *Public Development and Infrastructure Council*, regionally on the ULI Washington, DC/Baltimore *Transit – Oriented Development (TOD) Council*, and locally on ULI's Washington District *Regionalism Initiatives Council*. Dr. Bellas was the economic advisor to the Southeast Fairfax Development Corporation Board of Directors in calendar year 2012. He was appointed to the Board of Directors for the 2013 – 2014 term by Supervisor Jeffrey C. McKay (Lee District, Fairfax County, Virginia).



May 13, 2016

Commissioners of Charles County, Maryland
Charles County Government Building
P.O. Box 2150
La Plata, MD 20646

Re: 2016 Draft Comprehensive Plan

Dear Commissioners:

My name is David Cooksey. I am a lifelong resident of Charles County. I am currently employed as a Senior Vice President with Soltesz, a site civil engineering firm. I am also the General Manager of the Waldorf office of that firm. I have served in that capacity for over 20 years. Prior to joining Soltesz, I was employed by Charles County. My last position with the County was Chief of Comprehensive Planning.

I have been closely following the development of the 2016 draft Comprehensive Plan for the past five years. I have attended many meetings, presentations and public hearings on a regular basis.

The draft plan you have before you is the result of these sessions. This plan is significantly different than the current Comprehensive Plan adopted in 2006 as well as the Merged Scenario Plan which was the basis of the Draft 2015 Comp Plan submitted to the State of Maryland in January 2015 for review. Many of these differences are improvements which I support. However, there is one area of proposed change that I feel is not an improvement and should be reconsidered.

The area in question is the 1160 acres of land located west of Route 301, south of Billingsley Road, east of Middletown Road/Turkey Hill Road and north of Route 227. The draft plan before you today proposes to change the current land use designation of that area from Deferred Development District to "Watershed Conservation".

For several years and through many versions of this draft plan, this area had been envisioned as being designated as Development District. There are many reasons that this designation made sense and was supported by various groups, committees and even the County's planning staff. A last minute, somewhat controversial, decision to reclassify the area as Watershed Conservation was based on limited knowledge and lack of understanding of the impact this decision would have on several levels.

The following is a history of the area, a brief outline of how it was originally recommended for inclusion in the Development District and several reasons why I urge you to look closely at the proposed use and include the acreage within the Development District as part of this Comprehensive Plan.

In 1995, this 1160 acres received a sewer category upgrade to S-3. This action was taken in conjunction with the adoption by the County Commissioners of Resolution No. 95-57 which added the White Plains Sewer Area to the County's Comprehensive Water and Sewer Plan. This resolution also adopted "Alternative B" as the selected method of providing sewer to this area. "Alternative B" calls for one pump station to be constructed at a low point on the southern edge of the 1160 acres I am referring to in my comments. The construction of this pump station will allow the County to shut down four existing "temporary" pump stations and eliminate the need for any additional pump station to be constructed north of Billingsley Road in this watershed. These actions will provide Charles County with significant savings in operations and maintenance costs. It is much more cost effective to operate one central pumping facility than multiple facilities spread over a large area.

The entire 1160 acres was designated as a Priority Funding Area by the Charles County Commissioners with Resolution No. 00-48 in 2000. This designation was applauded by the then-Director of Planning for the State of Maryland (see enclosed letter) as being well thought out and very consistent with the idea of "Smart Growth".

Later that year, the County Commissioners expanded the Deferred Development District. The 1160 acre PFA was erroneously included in the mapping of this expansion even though Ordinance #00-93 specifically excluded any PFA areas from such action (see the highlighted reference on Page 1 of the Appendix to the Ordinance enclosed).

In 2009, a pact of 19 environmental groups, calling themselves "The Smarter Growth Alliance for Charles County", prepared and submitted to the County a document entitled "*Trouble Ahead. Use Alternate Routes*" (see attached report). This report encouraged the County to align the Development District boundary with that of the Priority Funding Area.

The report states that the percentage of residential lots developed outside of the County's Priority Funding Area has increased faster than any other county in Maryland. This situation will only worsen if 1160 acres of land, as proposed by the Planning Commission, is removed from the PFA and not included in the Development District. The report goes on to state, "Fortunately, there are appropriate places for growth in Charles County. In the Priority Funding Areas, public facilities are largely in place and growth can happen at comfortable and sensible densities (single family homes, well-designed townhomes and high-quality condominiums are welcome here)."

Finally, this report concludes that "Aligning the County's growth area with its Priority Funding Areas is a win for the County's' residents, ecology and economy."

In 2014, after two years of work sessions and public hearings, this area was designated as Tier II on the adopted Charles County Tier Maps. This action was taken in response to the adoption of "The Sustainable Growth and Agricultural Preservation Act of 2012" by the State of Maryland. This act required each jurisdiction in the State to create a Tier Map outlining the future growth areas where public sewer and water would be available.



This Tier Map designation was deemed appropriate by State officials based on the location of the area in question as well as the PFA designation and the S-3 sewer category. The site is served by Billingsley Road, a four lane divided highway. There is a 16" water main along the entire northern boundary of the 1160 acres. The whole area lies within 7,500 feet of Route 301 and the associated future rail corridor and potential rail station. An aerial photo of the area reveals that the 1160 acres is surrounded by residential development.

Another reason to keep the area in the Development District is that there is an elementary school currently under design located within the 1160 acres and fronting on Billingsley Road, an upgraded four lane divided roadway. Unless the surrounding area is allowed to develop as has been envisioned for many years, this school will not have a single student that could walk to class since any existing and/or future development will be across a four lane divided highway. All students attending the school will be required to be bused.

Another positive aspect of allowing the area to develop as planned is that it would be a major receiving area for TDR's. There is little developable residential land remaining within the proposed Development District boundaries and even less designated as PFA. Many of the currently undeveloped sites are either owned by the County and/or the State or the sites are zoned commercial and industrial uses and many of the residentially zoned parcels have significant environmental constraints. Even if only a portion of the 1160 acres is developed, there could be a significant use of TDR's for the area.

Finally, the entire 1160 acres, excluding a very small strip along Turkey Hill Road, is located outside of the Mattawoman watershed. Having a growth area outside of the Mattawoman watershed will allow the Development District to provide for anticipated growth without further impacts to the Mattawoman Creek.

For these reasons, I encourage you to:

- Place the entire 1,160 acres in the Development District, as recommended by the Charles County Planning Director.
- Retain the existing Priority Funding Area designation for the entire 1,160 acres.
- Retain the existing Tier II sewer designation for the entire 1,160 acres
- Promote Smart Growth in the County by utilizing TDR's in the 1,160 acres and allowing for development adjacent to a proposed school where previously public invested infrastructure is already in place.

Sincerely,

Soltesz, Inc.

A handwritten signature in black ink, appearing to read "David W. Cooksey", written over the printed name.

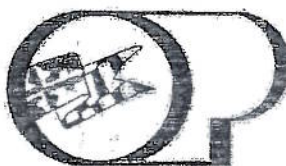
David W. Cooksey

Senior Vice President and General Manager

REPORT & RECOMMENDATION OF THE CHARLES COUNTY
ZONING OFFICER AND PLANNING DIRECTOR PROPOSING
AMENDMENTS TO THE CHARLES COUNTY ZONING MAP AS
PART OF THE
1999-2000 COMPREHENSIVE REZONING

The Charles County Planning Commission and County Commissioners are currently engaged in the comprehensive rezoning process. This process involves the consideration and adoption of amendments to the County comprehensive zoning plan which is reflected in the Zoning Ordinance and Maps. In considering changes to the County's comprehensive zoning plan, the Planning Commission and County Commissioners are guided by the goals, objectives and policies established in the County's Comprehensive Plan which was adopted pursuant to § 3.05 of Article 66B of the Annotated Code of Maryland and revised and updated as of June 23, 1997. The purpose of this report is to recommend that approximately 15,000 acres located within the County's Development District (the "Subject Area") be rezoned to a Rural Conservation (RC) base zoning or other less intensive base zoning classification. A description of the Subject Area is attached to this Report and Recommendation as Appendix A.

The Subject Area is located within the Development District, but is outside the County's Urban Core and Bryans Road Town Center and outside the Priority Funding Area which the County is required to certify pursuant to specific criteria set forth in the Smart Growth Areas Law, Chapter 759 of the Laws of 1997, Subtitle 7B of Title 5 of the State Finance and Procurement Article of the Annotated Code of Maryland. Because the Subject



MARYLAND Office of Planning

Parris N. Glendening
Governor

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PLANNING DEPARTMENT

June 8, 2000

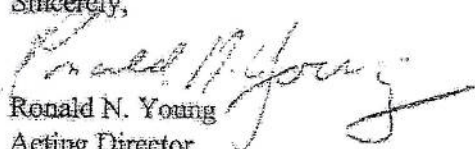
Steve Magoon, Director
Charles County Department of Planning and Growth Management
P. O. Box B
La Plata, Maryland 20646

Dear Mr. Magoon:

I have enclosed for your information and use a copy the Priority Funding Area map which will be distributed to funding agencies in accordance with the Smart Growth Areas Act of 1997. Once again I would like to express my appreciation for the effort made by Charles County to identify Priority Funding Areas consistent with the criteria for certifications by local government. Charles County certified a residential portion of the Priority Funding Area substantially smaller than the growth area indicated in the County Comprehensive Plan. The Priority Funding Area represents a substantial effort by Charles County to meet with the spirit as well as the letter of the Smart Growth Areas Act to set a priority within a larger planned growth area.

This map reflects changes made as a result of comments provided by your Office. Once again we would like to acknowledge your effort in developing the certified Priority Funding Areas. You and your staff have been extremely helpful and cooperative in our review of the certified Priority Funding Area map.

Sincerely,


Ronald N. Young
Acting Director

cc: Mike Paone



***THE ROAD MAP TO A SMARTER, GREENER,
AND MORE PROSPEROUS CHARLES COUNTY***

THE SMARTER GROWTH ALLIANCE FOR CHARLES COUNTY
June 2009

The Smarter Growth Alliance for Charles County is:

1000 Friends of Maryland

AMP Creeks Council

Audubon Naturalist Society

Chapman Forest Foundation

Chesapeake Bay Foundation

Citizens for a Better Charles County

Clean Water Action

Coalition for Smarter Growth

Conservancy for Charles County

Maryland Bass Federation Nation

Maryland Conservation Council

Mason Springs Conservancy

Mattawoman Watershed Society

Nanjemoy - Potomac Environmental Coalition, Inc.

Port Tobacco River Conservancy

Potomac River Association

Sierra Club, Maryland Chapter

Southern Maryland Audubon Society

St. Mary's River Watershed Association



EXECUTIVE SUMMARY

Charles County is envisioned as a land “where eagles fly.” But in Charles County, development is consuming natural areas at one of the fastest rates in the state.

Now Charles County government has applied for state and federal permits to build the Cross-County Connector (CCC) highway through the heart of the fragile Mattawoman Creek watershed. Through its direct and indirect impacts, the \$60 million project threatens the world class fisheries and wildlife habitat of the creek and the high quality of life enjoyed by the region’s residents. In response, the Maryland Department of the Environment and the U.S. Army Corps of Engineers recently asked numerous questions about the justification and potential adverse environmental impacts of the highway.

As part of this process, the Smarter Growth Alliance for Charles County proposes an alternative to the highway project that would protect Mattawoman Creek, accommodate growth, and connect residents with high-quality jobs:

1. Build what we really need

- Cancel the Cross County Connector
- Program rail transit and transit-oriented-development for construction in Waldorf
- Make our existing roads safe and complete Waldorf’s local roadway network

2. Build Smart

- Match the County’s development district to the Priority Funding Areas
- Protect Mattawoman’s stream valley with property acquisition and strong zoning

3. Build Green

- Cluster new development and raise the standard for new roads to protect water quality
- Install effective stormwater controls to clean up runoff from existing development

The immediate question is not *whether* Charles County should grow, but *how* and *where* Charles County should grow. Suburban-style highways are outdated concepts to solve problems related to growth, and in fact often exacerbate growth problems in the long term. Charles County first conceived the CCC decades ago. We now know that new highways typically end up generating even more growth. We also know a great deal more about the extent to which development affects the health of the natural environment.

Now is the time to fully embrace the modern concept of “smart growth” as the real key to long-term prosperity. The Alliance believes that growth according to these principles carries a double bottom line: protection for Charles County’s natural treasures and prosperity for Charles County’s residents and businesses. With a focus on creating compact, cohesive communities served by a full range of transportation choices, Charles County would improve quality of life, preserve natural areas, generate sustainable economic activity and position itself as a leader in the state for smart growth.



GETTING THERE

To experience “the land of pleasant living” one need only visit Charles County. Bordered by the Potomac River to the west and the Patuxent and Wicomico rivers to the east, the county “where eagles fly” is home to some of Maryland’s most treasured natural resources. Located in close proximity to Washington, D.C., the county is also home to a growing population. As such, Charles County’s vision statement describes an inspiring future:

Charles County is a place where all people thrive and businesses grow and prosper, where the preservation of our heritage is paramount; where government services to its citizens are provided at the highest level of excellence, and where the quality of life is the best in the nation.

The County’s vision is one of prosperity, where equal opportunity, safety and efficiency in governance and daily living provide a high quality of life. Life is enriched by the preservation and stewardship of those natural and cultural treasures that define the county.

Unfortunately, Charles County is at a critical juncture and may be headed in a different direction than its vision statement. Antiquated plans for more highways and harmful sprawl development threaten the very values and visions that local residents cherish the most. Of imminent concern is the Cross-County Connector (CCC), a proposed four-lane highway that would cut through the heart of the Mattawoman Creek watershed. Mattawoman



Creek is one of the County’s and the Chesapeake Bay’s true treasures, supporting a premier fishery that produces tremendous economic and environmental returns. If built, the CCC itself would destroy 7.6 acres of wetlands (more than 20% of the annual non-tidal wetland loss in Maryland¹), 6.1 acres of wetland buffer, and over 2000 feet of streams.² But the total impact to the county’s environment, rural character, and quality of life would likely be far greater, due in no small part to the sprawling growth and development brought on by the highway.

Mattawoman Creek is fast approaching a threshold. Development converts a natural landscape of forests, wetlands and open space to impervious surfaces, such as roads, driveways, parking lots, rooftops, and storm drains. These surfaces channel water, nitrogen and phosphorus pollution, sediments, trash, and toxic substances, into local streams and rivers. The runoff



erodes stream banks, increases pollutants to the water, and reduces the suitability of the habitat for wildlife. In general, water quality worsens when impervious surfaces exceed 10 percent of a watershed. The Mattawoman watershed is already above 8 percent paved over, and the Army Corps of Engineers projects by 2020 a loss of an additional 10,000 acres of forest to development; when building is complete, almost 25 percent of the watershed is projected to be covered with impervious surfaces.³ In fact, because of the potential adverse impacts to the watershed from the CCC and the induced development that would inevitably follow, American Rivers recently recognized Mattawoman Creek as the fourth most endangered river in the nation.

Fortunately, good alternatives remain and it is not too late to choose a different road. Protecting natural resources like Mattawoman's forests provides clean water and clear air at no cost. Directing growth to the existing urban core would address economic and social issues of special interest to Charles County, such as failing wells in the western county, designation as an ozone non-attainment area, and traffic congestion associated with sprawl.

The Smarter Growth Alliance for Charles County (SGACC) believes that three basic principles, defined by seven concrete policy actions, would dramatically improve the prognosis for Mattawoman Creek and put the county squarely on track to achieve its vision for prosperity and a high quality of life:

The three principles and seven policy actions include:

1. Build what we really need

- Cancel the Cross County Connector
- Direct funds to rail transit and transit-oriented-development in Waldorf
- Make our existing roads safe and complete Waldorf's local roadway network

2. Build Smart

- Match the County's development district to the Priority Funding Areas
- Protect Mattawoman's stream valley with property acquisition and strong zoning

3. Build Green

- Cluster new development and raise the standard for new roads to protect water quality
- Install effective stormwater controls to clean up runoff from existing development

The immediate question is not *whether* Charles County should grow, but *how* and *where* Charles County should grow. The SGACC believes that growth according to these principles carries a double bottom line: protection for Charles County's natural treasures and prosperity for Charles County's residents and businesses. The recommended actions support revitalized neighborhoods and bustling centers of commerce, mass transit and a network of safe and efficient connected local streets, thriving natural areas and a unique sense of place, all of which positions the county to be a leader in implementing 21st century growth management strategies to meet the challenges of today and the opportunities of tomorrow.



1. BUILD WHAT WE REALLY NEED

- Cancel the Cross County Connector
- Direct funds to rail transit and transit-oriented-development in Waldorf
- Make our existing roads safe and complete Waldorf's local roadway network

THE NEED FOR CHANGE

According to the Charles County Department of Planning and Growth Management, the CCC is not needed to fill an existing or future shortage in roadway capacity.⁴ Links between US 301 and western Charles County are provided by MD 6 between La Plata and Nanjemoy, MD 225 between La Plata and Indian Head, MD 227 between White Plains and Bryans Road, and MD 228 between Waldorf and MD 210. These east-west routes are in close proximity to each other. In fact, from MD 228 at the northern extent to MD 225 near Indian Head, a distance of eight miles, a traveler may select from no less than five existing crossings over Mattawoman Creek.



The County hopes to improve the safety and efficiency of its roadways by building the CCC and the Western Waldorf Bypass. However, it is well documented that suburban sprawl-style highways like these often fail to improve the roadway system, instead "inducing" more cars, longer commutes, and increased development in the area, which ultimately *reduces* efficiency.^{5,6,7,8,9} Good estimates of induced traffic and induced growth specifically related to the CCC are not presently available, despite requests from the Corps to the county for such an analysis. The County has provided an estimate of houses to be built directly along the route (in the thousands, on even more thousands of forested acres), but current studies suggest that for major roads like the CCC, induced growth and traffic extends well beyond the actual road alignment, especially in areas zoned for growth.¹⁰

Research shows that new highways spur development and often fail to improve the safety and efficiency of travel. Upgrading existing roads and bringing rail transit to the area would smooth traffic flow and offer the region more choices for getting around.

capacity increase can lead to travel growth on other roads as well as on new roads [and] highway lanes".¹¹ This means rural roads such as Billingsley Road, and already-congested highways like MD 210 through southern Prince George's County, could experience increased traffic volumes (and accidents) if the CCC is built. The Federal Highway Administration and

An improvement in traffic safety is far from certain, as well. The number of accidents may not drop; a recent EPA study noted that "a decision to use the new road probably means a decision to use a road connecting to it. Thus,



Maryland Department of Transportation found in a recent environmental impact statement that construction of the Intercounty Connector in Montgomery and Prince George's Counties would lead to a mere 0.2 percent reduction in accidents – one less crash for every 500 that occurred in the study area.¹² In addition, FHA and MDOT have recognized that the severity of accidents increases with higher travel speeds.¹³ It is quite possible that the CCC would facilitate thousands of acres of forest loss with little to no improvement in the safety and daily experience of the county's motorists.

A BETTER WAY

A truly safe and efficient transportation system depends on good *access* to work, school, shopping, and entertainment – not on the miles of roads. Charles has the second lowest ratio of jobs to people of any county in Maryland (0.58 jobs per adult).¹⁴ Less than half of Charles County's residents work in their home county, and more than a quarter spend over an hour traveling to work each day, twice the statewide average.¹⁵ Instead of trying to build more highways through lightly developed areas to move people to jobs elsewhere, bringing new jobs to existing communities would provide a real solution – one that would pump dollars into the local economy and provide new opportunities for revitalization and economic development. A more sustainable and prosperous strategy than paving over the farms and forests west of Waldorf would be to invest in existing communities, as



New subdivisions sprout along a highway in the Mattawoman Creek watershed. Expanding transit and job opportunities in existing communities would provide good access to services without inducing sprawl development.

envisioned by the Waldorf Sub-Area Plan (especially rail-based transit oriented development), the Plan for the Future of Downtown La Plata, and the Bryans Road Sub-Area Plan (if scaled back to preserve the area's sensitive environmental attributes and protect the Mount Vernon viewshed).



Charles County is graced with an abundance of transportation infrastructure including a north-south rail line through Waldorf, White Plains and La Plata, and it should take advantage of this unique yet unrealized opportunity to be a leader in smart growth. A recent article in the *Washington Post* highlighted widespread support from state and local officials for expediting rail transit through Waldorf and expanding bus, carpooling, pedestrian and bicycle options across the county.¹⁶ With adoption of the Waldorf Sub-Area Plan in 2004, the County supports development along US 301 as an excellent opportunity for smart and prosperous economic and residential development in conjunction with a rail line. Unfortunately, new highways like the Cross-County Connector and the Western Waldorf Bypass threaten to direct development and financial resources away from rail transit and potential transit-oriented, bike-friendly and walkable development options, casting doubt on their success, and belying the county's goal to coordinate land use and transportation planning. Indeed, Charles County's FY09-FY13 Capital Improvement Program earmarks tens of millions of dollars for road projects over the next five years, but does not include funding for rail transit.

Smart development would be further supported by a complete and enhanced local roadway network in Waldorf. Options for improving the local street grid abound, including the extension of Old Washington Road east of US 301 and the Western Parkway west of US 301. The addition of frontage roads, underground stormwater management, and innovative intersection designs on US 301 could alleviate congestion and avoid draining economic activity from Waldorf to new sprawl along a bypass. Targeted safety improvements along other county roads (particularly Billingsley Road), such as rumble strips, warning signs, slower speeds, and enhanced guard railing should be made. Efforts to improve curve radii and sight distances, limit curb cuts, add turn lanes or centerline turn prevention systems, widen shoulders, install centerline guard-railing, and improve intersections with roundabouts, signalization, and better geometrics may also be appropriate. These and other measures would alleviate some of the hazards associated with a two-lane country road, as demonstrated by past success on MD 90 in Worcester County and similar roadways around the nation.¹⁷ These safety improvements would address one reason cited for the CCC, likely at a fraction of the fiscal and environmental cost.

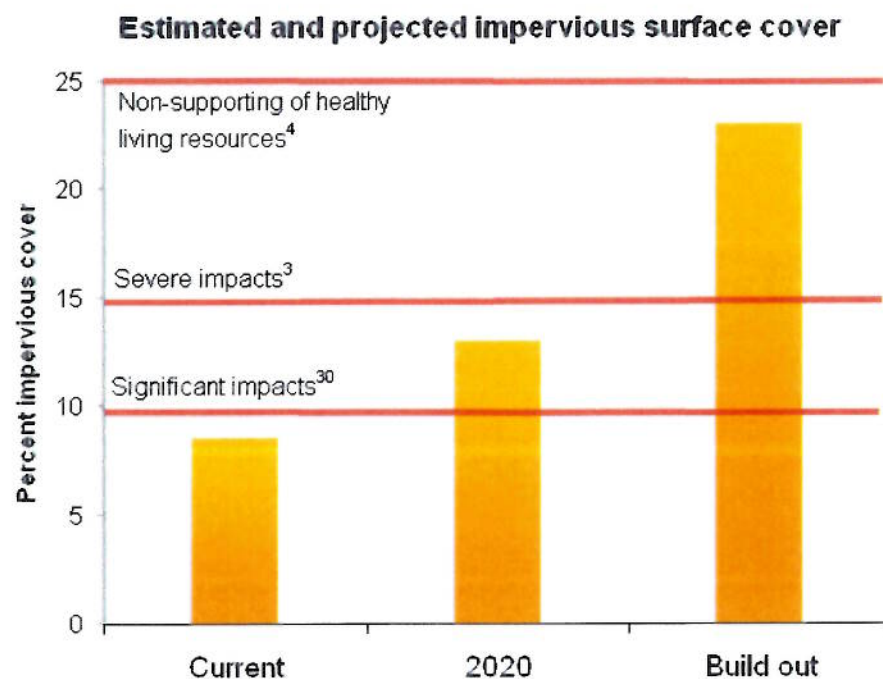


2. BUILD SMART

- Match the County's development district to the Priority Funding Areas
- Protect Mattawoman's stream valley with property acquisition and strong zoning

THE NEED FOR CHANGE

While the County has set a laudable goal to accommodate nearly three quarters of new development inside a planned growth area, the County's Development District measures 81 square miles (significantly larger than the land mass of Washington, DC) and covers more than half of the Mattawoman Creek watershed. Much of the development district is located outside of Priority Funding Areas (PFAs), the places regarded by the state as the most sensible areas for growth to occur (see figure 1, p. 10). According to the County's Comprehensive Plan, this massive district will have about one to four houses per acre when building is complete – a density that averages well short of smart growth goals.¹⁸



The Corps 2003 Mattawoman Creek Watershed Management Plan forecasts dramatic increases in impervious cover due to growth

As a result, impervious surface estimates for the Mattawoman watershed are forecasted to increase from an average of 8% in the year 2000, to almost 15% by 2020 and as much as 25% at build-out (see chart).¹⁹ The County describes streams with this much impervious cover as "showing clear signs of degradation", "not support[ing] diverse, healthy communities of living resources", and "largely destined to convey stormwater flows from urbanized land."²⁰ A

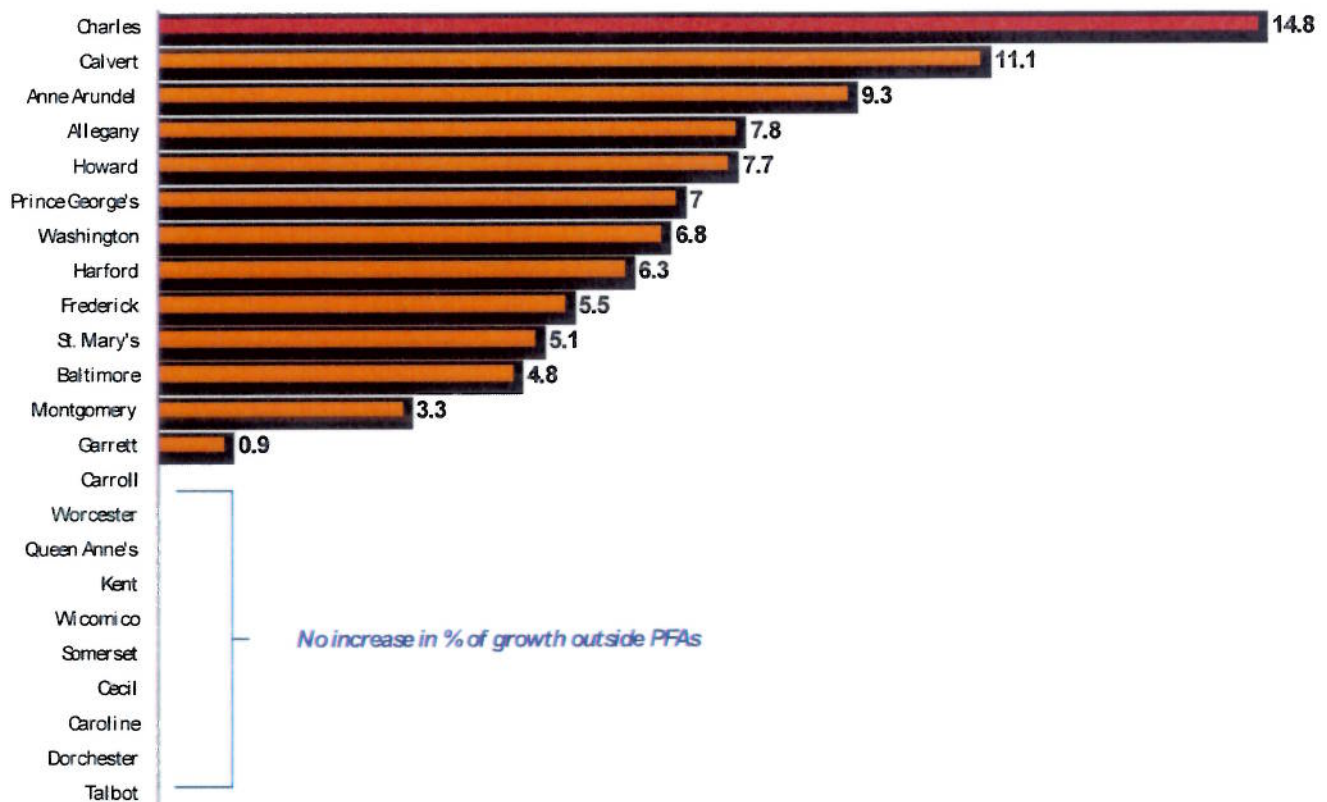
survey of the Chesapeake Bay watershed quickly confirms these observations, as does research from the Center for Watershed Protection.²¹

Unfortunately, this projection should not come as a surprise. The percentage of lots developed outside the County's Priority Funding Areas has increased faster in Charles than in any other county in Maryland.²² Charles County has converted over 12,700 acres of land to development since 1998, the third highest total in the state and more than Prince Georges, Anne Arundel, or Montgomery Counties.²³ The County is consuming an average of 1.5 acres of land per residential unit, the most of any metro-area jurisdiction in Maryland.²⁴ In sharp contrast to the



County's 'vision', what the County is likely to get if it builds the CCC is thousands more acres of precisely this type of harmful sprawl development.

Percent increase in new development outside Priority Funding Areas 1990-2005



According to MDP data, the percentage of new development outside PFAs has increased faster in Charles County than in any other county in Maryland over the past 15 years.²²

A BETTER WAY

Fortunately, there are appropriate places for growth in Charles County. In the Priority Funding Areas, public facilities are largely in place and growth can happen at comfortable and sensible densities (single family homes, well-designed townhomes and high-quality condominiums are welcome here). In fact, based on the County's numbers, there appears to be more than enough room in Charles County's Priority Funding Areas to accommodate planned growth for at least the next 15 years.^a This kind of growth is more equitable, because it brings reinvestment and opportunity to our existing communities. Smart growth can also lower the cost of public services to county taxpayers. Most of Charles County's PFAs are served by the Mattawoman Wastewater Treatment Plant, allaying fears that smarter growth would preclude the County

^a The 2006 Charles County Comprehensive Plan projects a need to accommodate 24,000 units in its growth areas between 2000 and 2025. The Plan shows room in the PFAs, the towns, and Waldorf for more than 35,000 new units.

